

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. SHAWN GRYGO,
2. SHANTEL MAGADANZ, and
3. HEATHER HEIM,

Defendants.

Case No. 24-337 (KMM/JFD)

UNITED STATES' BILL
OF PARTICULARS FOR
FORFEITURE OF PROPERTY

The United States Attorney's Office for the District of Minnesota, by and through Lisa D. Kirkpatrick, Acting United States Attorney, and Craig R. Baune, Assistant United States Attorney, hereby files the following Bill of Particulars.

Upon conviction of Counts 1-10 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), any property real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offenses, including but not limited to the following:

1. The real property located at 14015 Julliard Steet NE, Columbus, Anoka County, Minnesota, also identified by PID No. 35-32-22-21-0007;
2. The real property located at 2483 Lake Avenue, White Bear Lake, Ramsey County, Minnesota, also identified by PID No. 123022340006;
3. The real property located at 15974 Ethan Trail N, Hugo, Washington County, Minnesota, also identified by PID No. 18.031.21.21.0067.

Upon conviction of Counts 11-15 of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

If the above-described forfeitable property is unavailable for forfeiture within the definition of 21 U.S.C. § 853(p), the United States intends to seek the forfeiture of substitute property pursuant to as 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c) and 18 U.S.C. § 982(b).

Dated: March 21, 2025

LISA D. KIRKPATRICK
Acting United States Attorney

s/Craig Baune
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